

EXHIBIT 10

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF OHIO

SHYRIAA HENDERSON, on behalf of
herself and all others similarly situated,,

Plaintiff,

v.

UNITED STUDENT AID FUNDS, INC.
D/B/A USA FUNDS, et al.,

Defendants.

Case No.: 3:13-cv-1845 JLS BLM
(Pending in the United States District Court
for the Southern District of California)

DECLARATION OF CHRIS TAYLOR

I, CHRIS TAYLOR, declare:

1. I am employed as the Director of Collections for National Enterprise Systems, Inc.

The matters stated herein are known to me by my own personal knowledge and if called as a witness I could and would competently testify thereto.


2. NES has reviewed its records to determine how many calls it has placed to a USA Funds/Navient debtor from August 8, 2009 to the present. NES has collected on hundreds of thousands of Navient accounts since August 2009. As of September 2015, NES had placed 27,039,592 calls through the dialer on USA Funds/Navient accounts. Of this number 6,215,832 calls were to numbers identified by NES as cell phone numbers.

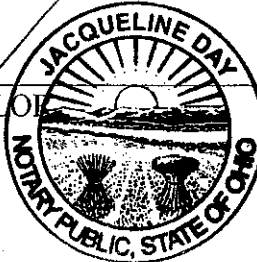
3. After conducting a telephone conference with Jeffrey A. Hansen, NES now estimates that it would take approximately two weeks of time at a cost of \$150 per hours to prepare a list of all such calls. First, it would still take approximately one week to develop the code and algorithms for extracting the massive amount of information from NES's database. A

code would have to be written to segregate the calls on USA Funds/Navient accounts from calls on other clients' accounts. NES cannot simply push a button and have the system or dialer produce this information. Second, NES still estimates that it would take approximately one full week to run the program due to the immense size, which will require a number of files, and review and examine the data to ensure that the program ran correctly.

4. Pursuant to the telephone conference with Jeffrey A. Hansen, the initial estimation of a third week will no longer be necessary to extract the correct information as Mr. Hansen agreed to receive the information in a text file (.txt) format instead of .csv. All told, NES estimates that the employee time and expense will be at least \$12,000.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on this February 3, 2016 of in Solon, Ohio.


CHRIS TAYLOR



JACQUELINE DAY

Notary Public
State of Ohio

Summit County

My Commission Expires
October 16, 2016